

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	Chapter 11
KrisJenn Ranch, LLC,	§	
	§	
<i>Debtor</i>	§	Case No. 20-50805-RBK

KrisJenn Ranch, LLC, KrisJenn Ranch,	§	
LLC–Series Uvalde Ranch, and KrisJenn	§	
Ranch, LLC–Series Pipeline ROW, as	§	
successors in interest to Black Duck	§	
Properties, LLC,	§	
	§	Adversary No. 20-05027-RBK
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	
DMA Properties, Inc. and Longbranch	§	
Energy, LP,	§	
	§	
<i>Defendants.</i>	§	

DMA Properties, Inc. and Frank Daniel	§	
Moore,	§	
	§	
<i>Cross-Plaintiffs/Third-Party Plaintiffs,</i>	§	
	§	
v.	§	Adversary No. 20-05027-RBK
	§	
KrisJenn Ranch, LLC, KrisJenn Ranch,	§	
LLC–Series Uvalde Ranch, and KrisJenn	§	
Ranch, LLC–Series Pipeline ROW, Black	§	
Duck Properties, LLC, Larry Wright, and	§	
John Terrill,	§	
	§	
<i>Cross-Defendants/Third-Party Defendants.</i>	§	

STIPULATION REGARDING ANSWER DEADLINE FOR
THIRD PARTY DEFENDANT LARRY WRIGHT

TO THE HON. RONALD B. KING, CHIEF UNITED STATES BANKRUPTCY JUDGE:

COME NOW Third-Party Plaintiffs DMA Properties, Inc. and Frank Daniel Moore (together, “Moore”) and Third-Party Defendant Larry Wright (together with Moore, the “Parties”) and stipulate and agree as follows:

1. On May 1, 2020, Krisjenn Ranch, LLC; Krisjenn Ranch, LLC, Series Uvalde Ranch; Krisjenn Ranch, LLC, Series Pipeline Row (together, “Debtors”) initiated the above-captioned adversary by filing a complaint against DMA Properties, Inc. (“DMA”) and others. *See* Adv. Dkt. 1.

2. On June 1, 2020, DMA filed its Counterclaim and a Third-Party Complaint against Larry Wright, among others. *See* Adv. Dkt. 6.

3. Summons was issued to Wright on June 2, 2020. *See* Adv. Dkt. 7. Summons was reissued on June 12, 2020 and the Clerk of Court noted Wright’s Answer due on July 13, 2020. *See* Adv. Dkt. 13.

4. No return of service on Wright has been filed.

5. On or about July 23, 2020, Wright engaged attorney William Germany to represent him in connection with the above-captioned adversary.

6. Mr. Germany accepted service of the Third-Party Complaint on behalf of Wright.
NOW THEREFORE,

A. The Parties agree and stipulate that Wright’s Answer or other responsive pleading to the Third-Party Complaint [Dkt. 6] shall be **August 14, 2020**.

IT IS SO STIPULATED.

Dated August 5, 2020.

[Remainder of page intentionally left blank, signature pages follow]

<p>LANGLEY & BANACK, INC. 745 East Mulberry, Suite 700 San Antonio, Texas 78212 Telephone: (210) 736-6600 Facsimile: (210) 735-6889 Email: nwilson@langleybanack.com</p> <p>By : <u>/s/ Natalie F. Wilson</u> NATALIE F. WILSON State Bar No. 24076779</p> <p>COUNSEL FOR Defendants/Third Party Plaintiffs DMA Properties, Inc. and Frank Daniel Moore</p>	<p>BAYNE, SNELL & KRAUSE 1250 N.E. Loop 410, Suite 725 San Antonio, Texas 78209 Email: wgermany@bsklaw.com Telephone: (210) 824-3278 Telecopier: (210) 824-3937</p> <p>By: <u>/s/ William P. Germany (w/ permission)</u> WILLIAM P. GERMANY State Bar No. 24069777</p> <p>COUNSEL FOR Third Party Defendant Larry Wright</p>
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Certificate of Service

I hereby certify that on August 5, 2020 a true and correct copy of the foregoing document was transmitted to each of the parties via the Court's electronic transmission facilities and/or via electronic mail as noted below. For those parties not registered to receive electronic service, a true and correct copy of the foregoing document was served by United States Mail, first class, postage prepaid, at the address noted below.

<p>Charles John Muller, IV Email: john@muller-smeberg.com Muller Smeberg, PLLC 111 W. Sunset San Antonio, TX 78209</p> <p>Ronald J. Smeberg Email: ron@smeberg.com The Smeberg Law Firm, PLLC 2010 W Kings Hwy San Antonio, TX 78201-4926</p> <p>Counsel to Plaintiffs Krisjenn Ranch, LLC, Krisjenn Ranch, LLC, Series Uvalde Ranch, Krisjenn Ranch, LLC, Series Pipeline Row</p>	<p>Michael Black Email: mblack@burnsandblack.com BURNS & BLACK PLLC 750 Rittiman Road San Antonio, TX 78209</p> <p>Jeffery Duke Email: jduke@dbmmlaw.com DUKE BANISTER MILLER & MILLER 22310 Grand Corner Drive, Suite 110 Katy, TX 77494</p> <p>Counsel to Defendant Longbranch Energy, LP</p>
<p>Ronald J. Smeberg Email: ron@smeberg.com The Smeberg Law Firm, PLLC 2010 W Kings Hwy San Antonio, TX 78201-4926</p> <p>Counsel to Third-Party Defendant Black Duck Properties, LLC</p>	<p>Shane P. Tobin Email: shane.p.tobin@usdoj.gov OFFICE OF THE U.S. TRUSTEE 903 San Jacinto Blvd, Room 230 Austin, Texas 78701</p> <p>United States Trustee</p>
<p>William P. Germany Email: wgermany@bsklaw.com BAYNE, SNELL & KRAUSE 1250 N.E. Loop 410, Suite 725 San Antonio, Texas 78209</p> <p>COUNSEL FOR Third Party Defendant Larry Wright</p>	<p>John Terrill 12712 Arrowhead Lane Oklahoma City, OK 73120</p> <p>Third Party Defendant, <i>pro se</i></p>

/s/ Natalie F. Wilson

NATALIE F. WILSON